

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

SMITH BARNEY TRANSFER AGENT
LITIGATION

This document relates to: all actions

05 Civ. 7583 (WHP)

ECF case

**NOTICE OF MOTION
FOR JUDGMENT ON THE PLEADINGS
THAT THE NEWLY NAMED PLAINTIFFS' CLAIMS ARE TIME-BARRED**

PLEASE TAKE NOTICE that defendants Smith Barney Fund Management LLC, Citigroup Global Markets Inc., and Lewis Daidone shall move this Court before the Honorable William H. Pauley III, in Courtroom 11D of the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on July 8, 2011, or as soon thereafter as counsel may be heard, for an order entering judgment on the pleadings and dismissing the Third Consolidated and Amended Complaint in its entirety as against all defendants.

This motion is made pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, and is based on the points and authorities set forth in the accompanying Memorandum of Law in Support of Defendants' Motion for Judgment on the Pleadings That the Newly Named Plaintiffs' Claims Are Time-Barred, the Declaration of Brian A. Sutherland dated July 8, 2011, in Support of Motion for Judgment on the Pleadings That the Newly Named Plaintiffs' Claims Are Time-Barred, and the exhibits attached thereto.

Dated: July 8, 2011
New York, New York

Respectfully submitted,

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